

BURSOR & FISHER, P.A.  
L. Timothy Fisher (State Bar No. 191626)  
Sarah N. Westcot (State Bar No. 264916)  
1990 North California Blvd., Suite 940  
Walnut Creek, CA 94596  
Telephone: (925) 300-4455  
Facsimile: (925) 407-2700  
E-Mail: [ltfisher@bursor.com](mailto:ltfisher@bursor.com)  
[swestcot@bursor.com](mailto:swestcot@bursor.com)

BURSOR & FISHER, P.A.  
Scott A. Bursor (State Bar No. 276006)  
369 Lexington Avenue, 10<sup>th</sup> Floor  
New York, NY 10017  
Telephone: (212) 989-9113  
Facsimile: (212) 989-9163  
E-Mail: [scott@bursor.com](mailto:scott@bursor.com)

BRAMSON, PLUTZIK, MAHLER & BIRKHAEUSER, LLP  
Alan R. Plutzik (State Bar No. 077785)  
Michael S. Strimling (State Bar No. 96135)  
2125 Oak Grove Road, Suite 120  
Walnut Creek, CA 94598  
Telephone: (925) 945-0200  
Facsimile: (925) 945-8792  
E-Mails: [aplutzik@bramsonplutzik.com](mailto:aplutzik@bramsonplutzik.com)  
[mstrimling@bramsonplutzik.com](mailto:mstrimling@bramsonplutzik.com)

Attorneys for Defendants Power  
Ventures, Inc. and Steve Vachani

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

FACEBOOK, INC.,

Plaintiff,

-against-

POWER VENTURES, INC. d/b/a POWER.COM, a  
California corporation; POWER VENTURES, INC.  
a Cayman Island Corporation, STEVE VACHANI,  
an individual; DOE 1, d/b/a POWER.COM, an  
individual and/or business entity of unknown nature;  
DOES 2 through 25, inclusive, individuals and/or  
business entities of unknown nature,

Defendants.

Case No. 5:08-CV-05780 JW (JCS)

**DECLARATION OF L. TIMOTHY  
FISHER REGARDING JANUARY  
26, 2012 JOINT DISCOVERY  
DISPUTE LETTERS**

1 I, L. Timothy Fisher, declare as follows:

2 1. I am a partner at Bursor & Fisher, P.A., counsel of record for Defendants Power  
3 Ventures, Inc. ("Power") and Steve Vachani (collectively, "Defendants"). I am an attorney at law  
4 licensed to practice in the State of California, and I am a member of the bar of this Court. I make  
5 this declaration in support of Defendants' positions set forth in the joint letters submitted to the  
6 Court today. I have personal knowledge of the facts set forth in this declaration and, if called as a  
7 witness, I could and would testify competently thereto.

8 2. Attached hereto as Exhibit A is a true and correct copy of the July 20, 2011  
9 deposition transcript of Steven Vachani.

10 3. Attached hereto as Exhibit B is a true and correct copy the January 9, 2012  
11 deposition transcript of Power Ventures, Inc.'s 30 (b)(6) Designee Steven Vachani.

12 I declare under the penalty of perjury under the laws of the State of California that the  
13 foregoing is true and correct, executed on January 26, 2012 at Walnut Creek, California.

14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



---

L. Timothy Fisher